

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

AMERICAN PATENTS LLC,

Plaintiff,

v.

TP-LINK TECHNOLOGIES CO., LTD.,

Defendant.

Civil Action No. 4:19-cv-765 ALM

**DECLARATION OF WINFRED SHU IN SUPPORT OF
TP-LINK TECHNOLOGIES CO., LTD. MOTION
TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Winfred Shu, declare as follows:

1. I am the Chief Financial Officer for TP-Link USA Corporation. I submit this Declaration in support of TP-Link Technologies Co., Ltd.'s Motion to Dismiss for Lack of Personal Jurisdiction. I have personal knowledge of the matters stated in this Declaration.

2. TP-Link USA Corporation is a corporation organized under the laws of the State of California with its headquarters and principal place of business at 145 South State College Blvd., Suite 400, Brea, California 92821.

3. TP-Link USA Corporation is solely responsible for importing, marketing, advertising, offering to sell, and selling TP-Link branded products in the United States, including the TP-Link branded products accused of patent infringement in the above-captioned case.

4. The TP-Link branded products accuse of patent infringement are not manufactured by TP-Link Technologies Co., Ltd. in China; they are manufactured by a third-party in Vietnam.

5. TP-Link USA Corporation is a wholly-owned subsidiary of TP-Link UK, Ltd. Neither TP-Link USA Corporation's parent company, TP-Link UK, Ltd., nor TP-Link Technologies Co., Ltd., direct or control the activities of TP-Link USA Corporation in importing, marketing, advertising, offering to sell, or selling TP-Link branded products in the United States.

6. TP-Link USA Corporation is not an agent of, and is not authorized to accept service of process direct to, TP-Link UK, Ltd. or TP-Link Technologies Co., Ltd.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: January 28, 2020


Winfred Shu (Jan 27, 2020)

Winfred Shu